

# EXHIBIT C

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**From:** R J WiL <reon@wellingtoninvestigations.co.nz>  
**Sent:** Monday, October 30, 2023 9:24 PM  
**To:** Eckley M. Keach III  
**Subject:** Re: [EXT] Re: Request for Expedited Investigation and Process Service

Yes we are working on it, 4 attempts have been made already, with no one coming to the door, apartment is occupied. Will make another attempt later tonight.

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

NTT Tower, level 16,  
157 Lambton Quay,

Mob: 021-562-333  
Office; 04-213-9414  
Free Call; 0800-787-732

[www.wellingtoninvestigations.co.nz](http://www.wellingtoninvestigations.co.nz)

On Tue, 31 Oct 2023 at 07:48, Eckley M. Keach III <[EKeach@ggtriallaw.com](mailto:EKeach@ggtriallaw.com)> wrote:

Mr. Viles,

Can you please provide us with a status update as to the service of Mr. Euringer? We have a court deadline of October 31 to serve or provide a status update.

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)  
Direct 702.777.0876 | Main 702.777.0888  
[EKeach@GGTrialLaw.com](mailto:EKeach@GGTrialLaw.com)



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**From:** Eckley M. Keach III  
**Sent:** Thursday, October 26, 2023 9:53 AM  
**To:** [reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)  
**Cc:** Sarah Campbell <SCampbell@GGTrialLaw.com>; Brian Williams <BWilliams@GGTrialLaw.com>  
**Subject:** RE: [EXT] Re: Request for Expedited Investigation and Process Service

Mr. Viles,

Attached is a copy of the summons and complaint. Please have your firm serve these personally on Mr. Euringer as soon as possible. If you cannot make service by 10/30, please let me know.

I am also attaching the proof of service form. When your firm accomplishes service on Mr. Euringer, please fill this out and send it to me along with whatever other proof of service documents you ordinarily provide.

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**  
One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)  
Direct 702.777.0876 | Main 702.777.0888  
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**From:** R J WiL <[reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)>  
**Sent:** Tuesday, October 24, 2023 12:21 AM

**To:** Eckley M. Keach III <[EKeach@GGTrialLaw.com](mailto:EKeach@GGTrialLaw.com)>

**Subject:** Re: [EXT] Re: Request for Expedited Investigation and Process Service

Apartment 8,

[76 Brougham Street,](#)

[Mount Victoria,](#)

[Wellington,](#)

[New Zealand, 6011](#),,,

On Tue, Oct 24, 2023 at 1:30 PM Eckley M. Keach III <[EKeach@ggtriallaw.com](mailto:EKeach@ggtriallaw.com)> wrote:

Mr. Viles,

I am following up from below. At your earliest convenience, can you please tell me the address that you have identified as belonging to Mr. Euringer so that I may add it to the summons?

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)

Direct 702.777.0876 | Main 702.777.0888

[EKeach@GGTrialLaw.com](mailto:EKeach@GGTrialLaw.com)



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**From:** Eckley M. Keach III

**Sent:** Monday, October 23, 2023 11:32 AM

**To:** [reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)

**Subject:** RE: [EXT] Re: Request for Expedited Investigation and Process Service

Mr. Viles,

Now that we have paid your invoice, can you please tell me the address that you have identified as belonging to Mr. Euringer so that I may add it to the summons?

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)  
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**From:** Eckley M. Keach III

**Sent:** Monday, October 23, 2023 11:15 AM

**To:** [reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)

**Subject:** RE: [EXT] Re: Request for Expedited Investigation and Process Service

We have paid your invoice.

I am waiting on the court to return a signed summons for this case. I expect it to be returned either today or tomorrow. As soon as I receive the summons, I will send a copy of it and the complaint to you for personal service on Euringer.

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

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Direct 702.777.0876 | Main 702.777.0888  
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**From:** R J WiL <[reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)>  
**Sent:** Sunday, October 22, 2023 2:22 PM  
**To:** Eckley M. Keach III <[EKeach@GGTrialLaw.com](mailto:EKeach@GGTrialLaw.com)>  
**Subject:** Re: [EXT] Re: Request for Expedited Investigation and Process Service

We will proceed and finalise the locate on James Euringer, I have sent invoice with PayPal link to make payment straight forward. Once received we will make 1st attempt within 72hrs,

Regards Reon Viles

On Mon, 23 Oct 2023 at 08:08, Eckley M. Keach III <[EKeach@ggtriallaw.com](mailto:EKeach@ggtriallaw.com)> wrote:

That is acceptable. Please send us an invoice. I will provide you with the summons and complaint to serve.

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)  
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On Oct 21, 2023, at 7:40 PM, R J WiL <[reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)> wrote:

I have run a preliminary locate to give you an estimate. We have found historic links to James Euringer with ## Sept 1969 in our database, and several recent articles to go through. Our locate estimate is 3hrs and database access, as we believe we have his current address this just needs to be data matched to confirm,

Our locate rate is \$120p/hr, and database is \$85,

Document service fee will be \$380plus gst, and travel is \$1.10km, which I included. affidavit preparation and swearing is \$85.

James appears to be residing in Wellington.

Our rates are plus gst,

Locate, \$445 plus gst

Process serve \$465plus gst, includes travel and affidavit.

Total \$910plus 15% gst,

This is required prior to finalising the locate,

If you wish to proceed I will have office send invoice.

Please excuse brevity sent from mobile device:

RJ Viles | Senior Investigator | WIL

Security Technician & Consultant.

NTT Tower, level 16,  
[157 Lambton Quay](#),

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On Sun, 22 Oct 2023 at 13:34, Eckley M. Keach III <[EKeach@ggtriallaw.com](mailto:EKeach@ggtriallaw.com)> wrote:

Thank you for the prompt reply.

We do not have an address for him. We would need you to locate him and his address.

Before starting would you kindly send a price quote for your services?

Thank you,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

One Summerlin | [1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135](#)  
Direct [702.777.0876](tel:702.777.0876) | Main [702.777.0888](tel:702.777.0888)  
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On Oct 21, 2023, at 4:42 PM, R J WiL <[reon@wellingtoninvestigations.co.nz](mailto:reon@wellingtoninvestigations.co.nz)> wrote:

Yes, we can do that for you.

Do you have the respondents address or would you like us to begin tracing them,

Regards Reon Viles



On Sat, 21 Oct 2023 at 11:52, Eckley M. Keach III <[EKeach@ggtriallaw.com](mailto:EKeach@ggtriallaw.com)> wrote:

Hello,

My firm represents a plaintiff in a lawsuit arising from the Southern District of New York. The case is Jane Doe 7015 v. Elektra Entertainment Group, Inc., et al., case 1:21-cv-0686-AJN-JEW.

We have been told that one of the named defendants in the case, James Euringer, resides in New Zealand, along with his wife, Chantal. We are seeking the services of an investigator and process server to locate James Euringer and serve him with a copy of the summons and complaint.

We have a deadline to serve Euringer by October 31, 2023. Can you please provide a quote for the cost of your services? We would like to start trying to serve Mr. Euringer on Monday, October 23, 2023, or as soon as possible.

Respectfully,

**Eckley M. Keach III**  
**Counsel | Greenberg Gross LLP**

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<image001.png>

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RJ Viles | Senior Investigator | WIL

MOJ Licensed Security Consultant & Technician

Government License # 23-103616

NZSA - Association Member

Worldwide Association Member - WASP

Certified Fraud Examiner - Associate Member

Office; NTT Tower, L16, [157 Lambton Quay, Wellington 6011](#)

Postal; [Suite 7953, Level 1, 6 Johnsonville Rd, Wellington 6037](#)

**M** [021 562 333](#) | **Office** [04 213 9414](#) | **Free Call** [0800 787 732](#)



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